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02 JUN 3 PN 1 TO 615 214 6311 OFFICE OF THE Fax 615 214 7406

EXECUTIVE SECRETARY
June 3, 2002

David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37238

> Re: Generic Docket to Establish UNE Prices for Line Sharing per FCC 99-355 and Riser Cable and Terminating Wire as Ordered in TRA Docket No. 98-00123 Docket No. 00-00544

Dear Mr. Waddell:

In its April 3, 2002 Order, the Authority addressed the issue of CLECs obtaining access to certain subloop elements. In resolving the parties' respective claims about the feasibility and advisability of permitting direct access to the terminals that house BellSouth's subloop facilities, the Authority stated, in relevant part:

"22. What process should the Authority adopt to enable CLECs to access [UNTW] and riser cable or [UINC]?

- 2. Order that if BellSouth chooses to protect its network and refuse direct access to unbundled subloop elements, BellSouth must construct and maintain intermediate access to the subloops at its own expense;
- Order the parties to negotiate procedures by which CLECs can notify BellSouth of any change made to BellSouth's network. Proposed Procedures should be filed within 45

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days of the entry of the Authority's order and should include, but should not be limited to, all issues related to network safety and security, inventory control, and performance measures . . ."

April 3 Order at pp. 44, 46-47. The time period referenced in Item 3, above, was subsequently changed to June 1 at the Directors Conference on May 21, 2002.

The purpose of this correspondence is to advise the Authority that BellSouth will avail itself of the option described in Item 2, above. That is, BellSouth will construct and maintain, at its own expense, intermediate access terminals through which the CLECs will obtain access to unbundled subloop elements in Tennessee. Under these circumstances, the negotiation of the notification procedures described in Item 3 will not be necessary because the CLECs will not be able to make any changes to BellSouth's network. Therefore, BellSouth has not proposed any notification procedures to the CLECs, and BellSouth does not intend to file any such procedures with the Authority in this docket.

Please contact me if you have any questions.

Very truly yours,

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Joelle Phillips

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CERTIFICATE OF SERVICE

I hereby certify that on June 3, 2002, a copy of the foregoing document was served on the parties of record, via the method indicated:

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